

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITHOUT PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-D and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions without prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara Binis

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Dated: February 3, 2017

EXHIBIT A – BEASLEY ALLEN CROW METHVIN PORTIS & MILES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-14334	Donnis Shirley, Jimmy Shirley v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.

EXHIBIT B – DAVIS & CRUMP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-00853	Brenda K. Axsom v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – LEVIN PAPANTONIO THOMAS MITCHELL RAFFERTY & PROCTOR

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-01177	Marcel Goadsby, Rob Hasson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-12920	Mildred Lindsey, Marshall Lindsey v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-33367	Shirley Kilpatrick v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – SIKOS CRAWFORD SIKOS & JOSEPH

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-33057	Karen Jennice Threlkeld v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-17592	Lori Grassi-Edwards v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Barbara R. Binis